



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION II
 2890 WOODBRIDGE AVENUE
 EDISON, NJ 08837

DATE: September 25, 2013

SUBJECT: Confirmation of Verbal Authorization to Initiate an Emergency Removal Action at the Superior Barrel and Drum Site in Elk, Gloucester County, New Jersey

FROM: Keith Glenn, On-Scene Coordinator
 Removal Action Branch

For Keith Glenn

TO: Walter Mugdan, Director
 Emergency and Remedial Response Division

THRU: Joseph D. Rotola, Chief
 Removal Action Branch

[Signature]

SITE ID: A23K

The purpose of this memorandum is to confirm the Division Director's September 24, 2013, verbal authorization of a \$600,000 total project ceiling, of which \$500,000 is for mitigation contracting. The verbal authorization was required to initiate an emergency Comprehensive Environmental Response Compensation and Liability Act (CERCLA) removal action at the Superior Barrel and Drum Site (Site) in Elk, Gloucester County, New Jersey.

On August 29, 2013, the New Jersey Department of Environmental Protection (NJDEP) requested assistance from the United States Environmental Protection Agency (EPA) to assess the conditions at the Superior Barrel and Drum Site. The owner of the Site had filed for bankruptcy in 2012, but the case was dismissed due to lack of information provided by the plaintiff.

On August 30, 2013 EPA OSCs met with NJDEP and Gloucester County officials at the Site. The OSCs observed thousands of containers, mostly 275-gallon totes and 55-gallon drums, located along the road as well as in the woods, wetlands, and elsewhere throughout the property. Containers were stacked several levels high in various locations and were in various states of deterioration. Containers were found to be leaking, void of tops, exposed to weather elements, rusted, damaged due to gunshots, stored improperly and lying on their sides. Numerous trailers were also observed and found to be open and containing 55-gallon drums. The containers throughout the Site appeared to be full, however most were not labeled. Labels noted on some containers included flammable liquids, corrosive, marine pollutant and flammable solid.

NJDEP referred the Site to EPA on August 30, 2013. Between August 30, 2013 and September 5, 2013, EPA pursued formal access to the property through an attorney representing the property owner. On September 5, 2013, EPA issued an Administrative Order on Consent to the property owner. On September 12, 2013, EPA obtained an Administrative Warrant for entry onto the property for the purpose of conducting an assessment of the materials present and their condition.

EPA initiated a removal assessment of the Site on September 13, 2013. As part of the removal assessment, the property was secured with fencing, visual inspections were conducted and container content samples were collected. Over 1,800 containers were identified. Containers were found to be leaking, void of tops, placed on their sides, reacting with the environment, dented, and bulging. HazCat chemical identification system techniques were used to field test materials for hazardous characteristics. Nearly 50% of containers exhibited characteristics of flammability, corrosivity, oxidizers, or chlorinated solvent. Confirmatory laboratory analysis of samples indicated the presence of numerous CERCLA designated hazardous substances including benzene, toluene, ethylbenzene and xylene.

Based on field observations and the corroborating analytical data, the OSCs determined the Site meets the criteria for a removal action as described in 40 CFR Section 300.415(b)(2)(i)(iii)(v)(vi)(vii) and (viii). As a result, on September 24, 2013, the OSC requested and was granted a verbal authorization of funding to initiate an emergency CERCLA Removal Action. This confirmation memorandum will be followed by a complete action memorandum and a corresponding funding increase to allow for removal and off site disposal of all identified site wastes.

Should you have any questions or require additional information regarding this Site, please feel free to contact me at (908) 420-4486.

Cc: J. Rotola, ERRD-RAB
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